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9 Attorneys for Plaintiff  
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 v.  
16 CHARLES KLASKY,  
17 Defendant.  
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No. CR 17-401-DMG

STIPULATION TO CONTINUE  
SENTENCING DATE

Current Sentencing Date:  
May 25, 2022 at 11:00 a.m.  
Proposed Sentencing Date:  
August 10, 2022 at 11:00 a.m.  
Location:  
Courtroom of the  
Honorable Dolly M. Gee

22 Plaintiff United States of America, by and through its counsel  
23 of record, Assistant United States Attorney Kristen A. Williams and  
24 defendant Charles Klasky, by and through his counsel of record,  
25 William Fleming, hereby stipulate as follows:

26 1. On or about July 5, 2017, the government filed an  
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1 information charging defendant with one count of conspiracy to  
2 commit health care fraud in violation of Title 18, United States  
3 Code, Section 371.

4 2. On August 9, 2017, defendant pled guilty to the single-  
5 count information. Sentencing was initially set for November 15,  
6 2017, but has since been continued, most recently to May 25, 2022.

7 3. The Probation Officer has not yet disclosed the  
8 Presentence Report to the parties and, pursuant to Federal Rule of  
9 Criminal Procedure 32(e)(2), is not yet obligated to do so.

10 4. Pursuant to his plea agreement with the government,  
11 defendant has cooperated with the government regarding United States  
12 v. Omid, et al., CR 17-661(A)-DMG, including through lengthy  
13 testimony at the trial of defendants Julian Omid, Surgery Center  
14 Management, LLC, and Mirali Zarrabi. Because post-trial motions for  
15 new trial in that case remain pending, it is possible that  
16 defendant's assistance could still be required. A continuance is  
17 appropriate because the government needs to consider fully any  
18 assistance provided by defendant prior to taking a position as to  
19 defendant's substantial assistance at sentencing.

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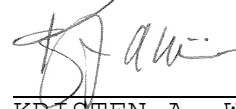
1           5.     Accordingly, by this stipulation, the parties jointly move  
2 to continue the sentencing date from May 25, 2022, to August 10,  
3 2022.

4           IT IS SO STIPULATED.

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6     Dated: March 26, 2022

TRACY L. WILKISON  
United States Attorney

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8     SCOTT M. GARRINGER  
Assistant United States Attorney  
Chief, Criminal Division

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11     KRISTEN A. WILLIAMS  
Assistant United States Attorney

12     Attorneys for Plaintiff  
13     UNITED STATES OF AMERICA

14     Dated: March 27, 2022

15     /s/ per email authorization  
16     WILLIAM FLEMING

17     Attorney for Defendant  
18     CHARLES KLASKY  
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